

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSE SANCHEZ

Petitioner,

VS.

JOHN ASHCROFT,
Attorney General of the United
States, and Bureau of
Citizenship and Immigration
Services

Respondent,

INS NO.: A36-917-445 2:32

COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF AND
PETITION FOR WRIT OF
HABEAS CORPUS

PETITION FOR STAY OF
DEPORTATION

04 10113 RCL

EMERGENCY MOTION FOR STAY OF DEPORTATION
AND TEMPORARY RESTRAINING ORDER

NOW COMES, the petitioner, **JOSE SANCHEZ**, in the above-entitled matter and hereby requests pursuant to Rule 65(b) of the Federal Rules of Civil Procedure that this Honorable Court temporarily restrain the *Department of Homeland Security Immigration & Customs Enforcement and The United States of America* from deporting the petitioner from the United States on January 22, 2004 for the reasons set forth in the attached brief.

WHEREFORE, the petitioner respectfully requests that this Honorable Court grant his request for a Stay of Deportation and Temporary Restraining Order until a determination on the merits can be made.

Respectfully submitted,
JOSE SANCHEZ,
By his attorneys,



Robert E. Craven, Esq.
ROBERT E. CRAVEN & ASSOCIATES
50 Park Row West, Suite 100
Providence, RI 02903
(401) 453-2700